

14-19-00154-CR

In the
Court of Appeals
For the Fourteenth Judicial District of Texas
At Houston

FILED IN
14th COURT OF APPEALS
HOUSTON, TEXAS
12/16/2019 11:52:26 AM
CHRISTOPHER A. PRINE
Clerk

◆
No. 1527611

In the 208th District Court
Of Harris County, Texas

◆
THE STATE OF TEXAS

Appellant

V.

JOHN WESLEY BALDWIN

Appellee

◆
**STATE'S MOTION TO FILE A
POST-SUBMISSION BRIEF**
◆

TO THE HONORABLE COURT OF APPEALS:

THE STATE OF TEXAS, pursuant to TEX. R. APP. P. 2 & 38.7, moves for permission to file a post-submission brief, and would show the Court the following:

1. The appellee was indicted for the offense of capital murder. (C.R. – 10). He filed a motion to suppress evidence obtained from his cell phone and his statements. (C.R. – 66-73). Judge Greg Glass issued an order granting the motion. (C.R. – 88-96). The State timely filed a notice of appeal from the trial court's order. (C.R. – 97-99).
2. This Court set the case for oral argument on December 11, 2019.

3. On December 11, 2019, this Court provided to the parties a letter requesting that the parties address certain issues and case law.
4. During oral argument, this Court requested that the parties research and respond to its inquiries with a post-submission filing.
5. The request of this Court merits a response by the State in the form of a post-submission brief so that justice may be served and this Court may be fully briefed. The State has therefore composed and submitted a post-submission brief.

WHEREFORE, the State prays that this Court will grant the requested motion to file a post-submission brief.

Respectfully submitted,

/s/ Cory Stott
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CERTIFICATE OF SERVICE

This is to certify that the undersigned attorney will request that a copy of the foregoing motion be served by efile.txcourts.gov to:

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Date: December 16, 2019